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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a	)	No. 2:08-cv-00235-CCC-JAD
Delaware Limited Liability Company,	)	
and MICHIGAN MULTI-KING, INC.,	)	<u>CLASS ACTION</u>
a Michigan Corporation, on Behalf of	)	
Themselves and All Those Similarly	)	NOTICE OF MOTION FOR
Situated,	)	PRELIMINARY APPROVAL OF
	)	PARTIAL CLASS ACTION
Plaintiffs,	)	SETTLEMENT
	)	
vs.	)	Motion Return Date: May 20, 2019
	)	
THOSE CERTAIN UNDERWRITERS	)	
AT LLOYD'S, LONDON MEMBERS	)	
OF SYNDICATES, et al.	)	
	)	
Defendants.	)	
_____	)	

TO: ALL COUNSEL OF RECORD:

**PLEASE TAKE NOTICE THAT** on May 20, 2019, Plaintiffs, by and through their counsel, shall move before the Honorable Claire C. Cecchi, U.S.D.J. at the United States District Court for the District of New Jersey, in Courtroom 5B located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order preliminarily approving the proposed Stipulation of Partial Class Action Settlement (the “Agreement”).<sup>1</sup>

By this motion, Plaintiffs respectfully move the Court for an Order:

1. Preliminarily approving the partial settlement set forth in the Stipulation (the “Partial Settlement”)<sup>2</sup> ;
2. Approving the proposed forms of notice and the notice plan, and directing that notices be disseminated pursuant to this plan; and
3. Setting a Fairness Hearing and certain other dates in connection with the final approval of the Partial Settlement.

In support thereof, Plaintiffs rely on the accompanying: (1) Memorandum of Law in Support of Plaintiffs’ Motion for Preliminary Approval of Partial Class Action Settlement; (2) the Jensen Declaration and exhibits thereto; (3) the Agreement; (4) the

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<sup>1</sup> A copy of the executed Stipulation is attached as Exhibit A to the accompanying Declaration of Rachel L. Jensen (the “Jensen Declaration”).

<sup>2</sup> The Settling Defendants are Lloyd’s Syndicates 0033, 0102, 0382, 0435, 0570, 0609, 0623, 0958, 1183, 1886, 2001, 2623 and 2987.

Declaration of Robert S. Schachter and exhibit thereto; (5) the Affidavit of Linda V. Young and exhibits thereto; (6) all other pleadings and matters of record; and (7) such additional evidence or argument as may be presented before or at the hearing.

DATED: April 19, 2019

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
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s/Rachel L. Jensen  
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